

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**In Re: TAXOTERE (DOCETAXEL)
PRODUCTS LIABILITY LITIGATION**

MDL NO. 2740

SECTION “H” (5)

**THIS DOCUMENT RELATES TO:
ALL CASES**

SECOND STIPULATION REGARDING PRETRIAL ORDER NO. 105

NOW INTO COURT come Plaintiffs, through Plaintiffs’ Co-Liaison Counsel (“PLC”), and Defendants, through Defendants’ Liaison Counsel (“DLC”) who respectfully submit this Second Stipulation Regarding Pretrial Order No. 105 (Docs. 10338 and 11347). The Plaintiffs and Defendants hereby stipulate as follows:

1. The Second Stipulation does not amend the Stipulation Regarding Pretrial Order No. 105 in any respect except for paragraph 1.
2. Whether to File a Motion
 - a. If Defendants have **not** opposed or have consented to the amendments to Short Form Complaints, the deadline is January 15, 2021 to file a motion to amend per the Stipulation Regarding PreTrial Order No. 105. Plaintiffs should denominate their Motion as an “Ex Parte/Consent Motion for Leave to File Amended Short Form Complaint.”
 - b. If Defendants have opposed or have objected to the amendments to Short Form Complaints on any grounds, that Plaintiff should **not** file any motion on or before January 15, 2021. If a Defendant has opposed or not consented to the amendments

to Short Form Complaints, and the Plaintiff has already filed a motion for leave, Plaintiff will withdraw the motion without prejudice.

3. The parties will continue to meet and confer to jointly present a Pretrial Order on the call docket procedure for Short Form Complaint amendments related to PTO 105 Statute of Limitations amendments.

Dated: January 14, 2021

Respectfully submitted,

/s/M. Palmer Lambert

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505(b)(2) Defendants' Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record who are CM/ECF participants.

/s/ Dawn M. Barrios

DAWN M. BARRIOS